

January 29, 2016

CCN 237340

Ms. Roylene Cunningham
US EPA Region 10 (OCE-127)
1200 Sixth Ave., Suite 900
Seattle, WA 98101

SUBJECT: Revised Annual Notification of Planned Renovation Operations at the Idaho
National Laboratory Site for Calendar Year 2015

Dear Ms. Cunningham:

This letter provides a revised notification of individual planned renovation operations involving regulated asbestos-containing material (RACM) at the Idaho National Laboratory Site during calendar year 2015. The estimated quantity of RACM to be removed for each individual project was below the threshold amounts reportable on individual notification forms required by 40 CFR 61.145(b)(3)(i).

The attached notification provides the actual quantities of RACM removed during calendar year 2015 and is a revision to the original notification that was submitted on December 16, 2014 (CCN 234633). This notification covers such renovation operations for Battelle Energy Alliance, LLC (BEA) and CH2M-WG Idaho, LLC (CWI).

If you have any questions, please contact Jenifer Nordstrom, of BEA at (208) 526-8119.

Sincerely,



Timothy A. Miller, Director
Environmental Support and Services

JBN:CMM

Enclosures

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cc: T. R. Allen, INL, MS 3695
J. Alvarez, INL, MS 3695
K. J. Beierschmitt, INL, MS 3695
P. K. Bowers, DOE-ID, MS 1226
K. W. Daniels, CWI, MS 9204
J. C. Fogg, DOE-ID, MS 1221
EPA Region 10, Idaho Operations Office (c/o Industrial Hygiene Resources)
M. La Marca, DOE-ID, MS 1222
C. S. Mascareñas, INL, MS 3405
M. M. Mitchell-Williams, DOE-ID, MS 1221
R. D. Owen, DEQ – Idaho Falls Regional Office
A. O. Perez, DOE-ID, MS 1221 (CDRL F.35)
T. L. Perkins, DOE-ID, MS 121
S. L. Reno, CWI, MS 9208
M. S. Rosenberger, CWI, MS 9208
T. J. Safford, DOE-ID, MS 1216
J. J. Saye, CWI, MS 9106
D. M. Storms, INL, MS 3898
T. Trumbull, DEQ, Boise, ID

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Operator Project # Annual – CY15		Postmark		Date Received		Notification #																			
I. Type of Notification (check one): <input type="checkbox"/> Original <input checked="" type="checkbox"/> Revised <input type="checkbox"/> Canceled																									
II. Facility Description Building Name: Numerous buildings and structures at the Idaho National Laboratory Site Address: P.O. Box 1625 City: Scoville State: Idaho Zip Code: 83415 County: Parts of Bingham, Bonneville, Butte, Clark and Jefferson Site Location: Idaho National Laboratory Site: This annual notification covers planned individual facility renovation operations involving the removal and/or disturbance of regulated asbestos-containing materials (RACM) in quantities below the threshold amounts reportable on individual notification forms required by §61.145(b)(3)(i). The estimated quantities of RACM reported in Section VII are based upon historical operations.																									
Building Size (square feet): Variable	# of Floors: Variable	Age in Years: Up to approximately 62 years	Present use: U.S. Department of Energy facility for nuclear and other research		Prior Use: Same as "present use"																				
III. Type of Operation (check one): <input type="checkbox"/> Demo <input type="checkbox"/> Ordered Demo <input checked="" type="checkbox"/> Renovation <input type="checkbox"/> Emergency Renovation <input type="checkbox"/> Fire Training																									
IV. Is Asbestos Present (check one): <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No																									
V. Facility Information Owner Name: U.S. Department of Energy, Idaho Operations Office (DOE-ID) Address: 1955 Fremont Avenue City: Idaho Falls State: Idaho Zip Code: 83415 Contact: Timothy J. Safford Telephone: (208) 526-5670 Fax: (208) 526-1926 Operator/Removal Contractor Name: CH2M-WG Idaho, LLC Address: MS 9125, 1580 Sawtelle Street City: Idaho Falls State: Idaho Zip Code: 83402 Contact: M. Shawn Rosenberger Telephone: (208) 533-0027 Fax: (208) 533-3948 Operator/Removal Contractor Name: Battelle Energy Alliance, LLC Address: P.O. Box 1625 City: Idaho Falls State: Idaho Zip Code: 83415 Contact: Jenifer B. Nordstrom Telephone: (208) 526-8119 Fax: (208) 526-3149																									
VI. Procedure, including analytical methods, employed to detect the presence of and to estimate the quantity of RACM and Category I and Category II non-friable ACM: The presence of asbestos in bulk building material samples is determined using the method specified in Appendix E, Subpart E, 40 CFR Part 763, Section 1, Polarized Light Microscopy (PLM). As an alternative to bulk sampling and analysis, material may be presumed to contain asbestos based on the type of building material and age of construction. Procedures used to estimate the quantity of RACM and/or Category I and Category II non-friable ACM include, but are not limited to: facility drawings, dimension measurements, and calculations.																									
VII. Approximate Amount of Asbestos Materials <table border="1" style="width:100%; border-collapse: collapse; margin-top: 5px;"> <tr> <th rowspan="2"></th> <th rowspan="2">RACM to be Removed</th> <th colspan="2">Non-friable Asbestos Material NOT to be Removed</th> </tr> <tr> <th>Category I</th> <th>Category II</th> </tr> <tr> <td>Pipes (linear feet)</td> <td align="center">224 75</td> <td></td> <td></td> </tr> <tr> <td>Surface Area (square feet)</td> <td align="center">78 2</td> <td></td> <td></td> </tr> <tr> <td>Facility Components (cubic feet)</td> <td align="center">6 3</td> <td></td> <td></td> </tr> </table>									RACM to be Removed	Non-friable Asbestos Material NOT to be Removed		Category I	Category II	Pipes (linear feet)	224 75			Surface Area (square feet)	78 2			Facility Components (cubic feet)	6 3		
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Pipes (linear feet)	224 75																								
Surface Area (square feet)	78 2																								
Facility Components (cubic feet)	6 3																								
VIII. Scheduled Dates Demolition or Renovation: Start: 01/01/15 Complete: 12/31/15																									
IX. Dates for Asbestos Removal (MM/DD/YY): Start: 01/01/15 Complete: 12/31/15																									
Days of the Week:	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday																		
Hours of Operation:	7am-5pm	7am-5pm	7am-5pm	7am-5pm																					

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X. Description of planned Demolition or Renovation work to be performed and method(s) to be employed, including demolition or renovation techniques to be used and description of affected facility components: Demolition activities are not included within this annual notification, but will be reported via individual notifications prepared in accordance with §61.145(b). Planned renovation activities addressed within this notification involve the removal of RACM from facilities and facility components in accordance with §61.145 and §61.150. Work methods may include, but are not limited to, both mechanical and manual removal of RACM using hand tools and/or machinery with intact removal from a facility or facility component as a unit or in sections. Facility components that may be affected during renovation activities include architectural components (e.g., interior and/or exterior finishing materials), structural systems (e.g., beams, columns, walls and foundations), mechanical systems (e.g., heating, ventilation and air conditioning (HVAC) systems and plumbing systems), and electrical systems.

XI. Description of work practices and engineering controls to be used to comply with the requirements, including asbestos removal and waste handling emission control procedures: All renovation activities involving the removal of RACM will be performed in accordance with §61.145(c) and §61.150. More specifically, RACM removal from a facility or facility component will occur as a unit or in sections. Exposed RACM will be adequately wet during cutting, stripping, and/or disjoining operations, and RACM which has been removed or stripped will remain adequately wet until collection and containerization. In addition to wet methods, asbestos abatement activities may include the use of negative pressure enclosure and glovebags. No visible emissions will be discharged to the outside air during the collection, processing, packaging, transport, and disposal of asbestos-containing material.

XII. Waste Transporter

Name: CH2M-WG Idaho, LLC

Address: MS 9226, 1580 Sawtelle Street

City: Idaho Falls

State: Idaho

Zip Code: 83402

Contact: Travis R. Myers

Telephone: (208) 533-3377

Waste Transporter

Name: Battelle Energy Alliance, LLC

Address: PO Box 1625

City: Idaho Falls

State: Idaho

Zip Code: 83415

Contact: Don Darrington

Telephone: (208) 526-1361

Waste Transporter

Name: Tri-State Motor Transit

Address: 8141 East 7th Street Road

City: Joplin

State: Missouri

Zip Code: 64802

Contact: Shift Supervisor

Telephone: (800) 234-8768

XIII. Waste Disposal

Name: Central Facilities Area (CFA) Landfill Complex

Address: Central Facilities Area, P.O. Box 1625, Idaho National Laboratory

City: Scoville

State: Idaho

Zip Code: 83415

Contact: Norman K. Winter

Telephone: (208) 526-8448

Waste Disposal

Name: Energy Solutions, LLC

Address: Clive Disposal Site, Interstate 80 Exit 49

City: Clive

State: Utah

Zip Code: 84029

Contact: Transportation Compliance

Telephone: (435) 884-0155

Waste Disposal

Name: Nevada National Security Site (NNSS) (Formerly Nevada Test Site)

Address: NNSS Zone 5

City: Mercury

State: Nevada

Zip Code: 89023

Contact: Chris Chalupka

Telephone: (702) 295-6348

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XIV. Emergency Demolition (complete item XIV only if this project is an Emergency Demolition)

1. Attach a copy of the Order to this notice.
2. Name of Authority Issuing Order: _____ Title: _____
3. Authority of Order (Citation of Code): _____
4. Date of Order (MM/DD/YY): _____ Date Ordered to Begin _____

XV. Emergency Renovation (Attach separate sheet with the following information if project is Emergency Renovation.)

1. Date and Hour of the Emergency:
2. Description of the Sudden, Unexpected Event:
3. Explanation of how the event caused unsafe conditions or equipment damage or an unreasonable financial burden.

XVI. Description of procedures to be followed in the event that unexpected RACM is found or non-friable ACM becomes crumbled, pulverized, or reduced to powder: Any such asbestos will be handled using the same procedures for schedule materials as previously referenced in Section XI.

XVII. I certify that an individual trained in the provisions of NESHAP (40 CFR Part 61, Subpart M) will be on-site during the Demolition or Renovation, and evidence that the required training has been accomplished by this person will be available during normal business hours.

Carolyn S. Mascareñas
Signature of Owner/Operator

1-12-14
Date

Carolyn Mascareñas, Director ESH&Q
Type or Print Name and Title

XVIII. I acknowledge the existence of laws prohibiting the submission of false or misleading statements, and I certify that the facts contained in this notification are true, accurate, and complete.

Carolyn S. Mascareñas
Signature of Owner/Operator

1-12-14
Date

Carolyn Mascareñas, Director ESH&Q
Type or Print Name and Title